

Evaluation of Plans for Involvement of Human Subjects

CARRA Peer Review Training
2005

Learning Objective

List four elements that are evaluated regarding involvement of human subjects in research plans.

An Introduction to Evaluating Involvement of Human Subjects

If an application includes human subjects, four elements related to their involvement in the research must be evaluated and coded:

- 1) Protection of Human Subjects from Research Risk.
- 2) Plan to Include Women.
- 3) Plan to Include Minorities.
- 4) Plan to Include Children.

1. Protection of Human Subjects from Research Risk

Applicants must:

- address the involvement of human subjects and protections from research risk in the proposed research plan, or
- provide sufficient information to show that the research is exempt from regulations that cover the protection of human subjects.

Protection of Human Subjects from Research Risk

- Federal regulations require that information provided in the application must be evaluated based on the following criteria:
 - risk to subjects.
 - adequacy of protection against risks.
 - potential benefits of the proposed research to subjects and others.
 - importance of knowledge to be gained.

If the research includes a clinical trial, the application **MUST** also include a plan for monitoring data and safety of the clinical trial.

Evaluation of Protection of Human Subjects from Research Risk

- Reviewers, including CARRA members, should note whether the plan to protect subjects from risk is
 - Absent
 - Acceptable – addresses all criteria adequately & appropriately.
 - Unacceptable – does not adequately address all criteria.
 - Exempt – adequate justification is given for one of the 6 exemption categories.
- If an application contains a clinical trial, the Data Safety Monitoring Plan must also be evaluated (Absent, Acceptable, or Unacceptable).
- If either plan is absent or unacceptable, the application may receive a “Human Subjects Concern” code which blocks the possibility of award.

2 Plan to Include Both Genders



Evaluating Plans for the Inclusion of Both Genders

- **Absent**
- **Acceptable**
 - Both genders included in appropriate numbers.
 - One gender is acceptably excluded or severely limited (e.g., prostate cancer or ovarian cancer).
 - Gender representation doesn't matter for the research.
- **Unacceptable**
 - Representation fails to conform to NIH policy.
 - Application provides insufficient information.
 - Application does not adequately justify limited representation of one gender (e.g., a study of lung or colon cancer in men only without adequate explanation).
- **“Targeted Enrollment” table required in the application**
- **IF Phase III Clinical Trial proposed**, applicants expected to design trial to test gender differences, or justify why this is not necessary.

Codes for the Inclusion of Both Genders

- Each Code is 3 digits
 - 1st character G (indicates Gender Code)
 - 2nd character 1,2,3, or 4 (indicates type of representation proposed)
 - 1 = both genders
 - 2 = women only
 - 3 = men only
 - 4 = unknown
 - 3rd character A or U (indicates acceptable or unacceptable)

Gender Codes	
Gender Representation	Scientifically... Acceptable or Unacceptable
1 Both Genders	G1A or G1U
2 Women Only	G2A or G2U
3 Men Only	G3A or G3U
4 Unknown	G4A or G4U

3 Plan to Include Minorities



Evaluation of the Plans for Inclusion of Minorities

Racial and ethnic categories are:

- American Indian or Alaska Native.
- Asian.
- Black or African American.
- Hispanic or Latino.
- Native Hawaiian or Other Pacific Islander.
- White.

Evaluating Plans for Inclusion of Minorities

- Absent
- Acceptable
 - Minority individuals are included in scientifically appropriate numbers and recruitment/retention has been realistically addressed.
 - There is adequate justification for exclusion or limited representation of some minority groups or subgroups.
 - Racial or ethnic origin of specimens or existing datasets cannot be accurately determined and it doesn't matter for the research proposed.

Evaluating Plans for Inclusion of Minorities

- **Unacceptable**
 - Minority representation fails to conform to NIH policy.
 - Insufficient information is provided to determine minority inclusion.
 - Application does not adequately justify limited representation of minority groups or subgroups.
 - Application does not adequately address recruitment/retention of some or all minority groups or subgroups.
- “Targeted Enrollment” table required to indicate racial and ethnic groups of potential subjects.
- **IF a Phase III Clinical Trial is proposed**, the trial is expected to be designed to test racial/ethnic differences unless an adequate justification is provided that this is not necessary.

Codes for the Inclusion of Minorities

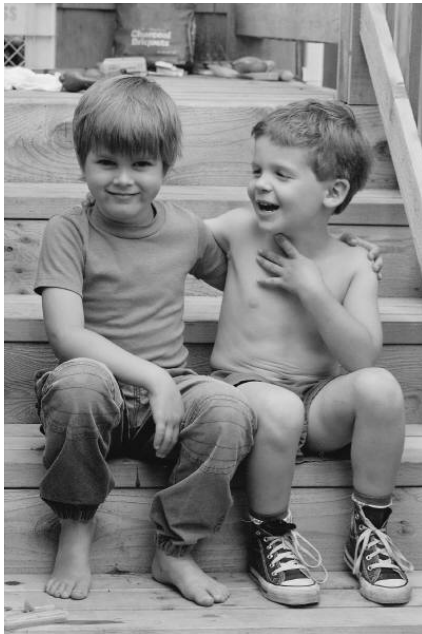
Each Code is 3 digits

- 1st character M (indicates Minority Code)
- 2nd character 1,2,3,4, or 5 (indicates type of representation proposed)
 - 1 = both minorities & non-minorities included
 - 2 = minorities only
 - 3 = non-minorities only
 - 4 = unknown
 - 5 = Foreign
- 3rd character A or U (indicates acceptable or unacceptable)

Minority Codes

Minority Representation	Scientifically... Acceptable or Unacceptable
1 Both	M1A or M1U
2 Minorities Only	M2A or M2U
3 Non-Minorities Only	M3A or M3U
4 Unknown	M4A or M4U
5 Foreign	M5A or M5U

4 Plan to Include Children



Evaluating Plans for the Inclusion of Children

- NIH defines “child” as a person under age 21
- Plans for inclusion may be
 - Absent
 - Acceptable
 - Both children and adults will be included and plans are appropriate.
 - Only children are represented in the study and the plans are appropriate.
 - No children are included and an acceptable justification for exclusion is provided.
 - Representation of children is not known and this does not compromise the scientific objectives of the research.

Evaluating Plans for the Inclusion of Children

- **Unacceptable** -
 - Both children and adults are included, but no rationale is provided for selecting or excluding a specific age range.
 - Only children are represented in the study, but the age range is too restricted to be scientifically acceptable.
 - No children are included and an acceptable justification for exclusion is not provided.
 - Representation of children is not known and it compromises the objectives of the research.

Codes for the Inclusion of Children

Each Code is 3 digits

- 1st character C
(indicates Child Code)
- 2nd character 1,2,3, or 4
(indicates type of representation proposed)
 - 1 = both children & adults
 - 2 = children only
 - 3 = adults only
 - 4 = unknown
- 3rd character A or U
(indicates acceptable or unacceptable)

Child Codes	
Child Representation	Scientifically... Acceptable or Unacceptable
1 Both Adults & Children	C1A or C1U
2 Children Only	C2A or C2U
3 Adults Only	C3A or C3U
4 Unknown	C4A or C4U